Before the

FEDERAL COMMUNICATIONS COMMISSION
Washington, DC. 20554

In the Matter of	)	
	)	
Inquiry Regarding Carrier	)	**ET Docket No. 03-104**
Current Systems, including	)	
Power Line Broadband Systems	)	
	)	

To: The Commission

REPLY COMMENTS of Richard L. Green
WC1M Amateur Radio Operator to the Comments Submitted by PPL Telecom, LLC

The following is a set of reply comments from Richard L. Green, an Amateur Radio operator (Extra Class licensee, call sign WC1M) and high-technology executive with 27 years of experience in the management, technical design and marketing of communications systems.

My comments are in response to the comments in this docket filed by PPL Telecom LLC (PPL).

There is Evidence of Interference by BPL to Amateur Radio

In Section V of its comments, PPL states:

> For the reasons set forth below, PPL Telcom believes that BPL does not pose significant risks for unintended high frequency radiations that will impair the operation of consumer devices, amateur radio communications, or other forms of commercial

> communications (e.g. television, radio, mobile radio, etc.):

PPL goes on to say:

> PL technology providers have taken, through product design and independent testing, great efforts to ensure that their technology does not interfere with users of FCCregulated radio bands and will meet FCC Part 15 requirements.[2]

In footnote 2, PPL says:

> [2] FCC Order 97-Section 157 essentially places the burden on BPL opponents to justify blocking a new entrant or technology that may provide more affordable telecommunications services to a broader base of customers. PPL Telcom believes that the arguments raised by amateur radio forums do not meet this burden and do not provide any direct evidence that BPL vendors' technologies cause interference in excess of approved limitations established by FCC guidelines.

PPL is incorrect in its assertion that amateur radio forums do not provide any direct evidence that BPL vendors' technologies cause interference in excess of approved limitations established by FCC guidelines. I would like to call the Commission's attention to to a video showing BPL interference tests conducted by the Amatuer Radio Relay League (ARRL) in BPL test communities in Maryland, Virginia,

Pennsylvania, and New York. The video may be found on the ARRL website at http://216.167.96.120/BPL_Trial-web.mpg. The tests clearly show massive interference to broad sections of the HF spectrum, with signal levels from moderate to severe.

It does not take a great deal of technical knowledge to conclude that BPL will cause interference: the power grid is a massive antenna system that lacks shielding to prevent radiation of radio energy carried on the lines. At relatively modest signal strength, BPL in the HF spectrum can and will radiate sufficiently to cause interefernce both locally and over great distances via ionospheric propagation.

Conclusion

It is clear that BPL will cause devastating interference to a broad range of HF spectrum users, including Amateur Radio, international shortwave broadcasts, radio astronomy, military communications, long-range aircraft communications and possibly over-the-air television broadcasts near the HF spectrum. In view of the clear intent of Congress when the Commission was formed, the Commission cannot and should not permit such interference.

Recommended Actions

The Commission should require that BPL interference not occur to any existing radio service, in particular the Amateur Radio service, the international short-wave broadcasting service, radio astronomy service, military service and long-range aircraft service. In addition, the Commission should ban BPL emissions in the frequency bands allocated to these services. I call the Commission's attention to the fact that there is ample precedent for this action: BPL has been banned in Germany and Japan due to excessive HF interference.

Respectfully submitted,

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